



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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September 11, 2008

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Via Facsimile (212) 805-6304

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: Kevin Harris v. City of New York et al.
07 CV 11171 (PAC)(KNF)

Your Honor:

I am the Assistant Corporation Counsel in the Office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendant City. Plaintiff has filed the above-referenced complaint, wherein he alleges that on August 24, 2007, he was falsely arrested and imprisoned by New York City police officers. Defendant City respectfully requests a 45-day enlargement of fact discovery from September 15, 2008 to October 30, 2008. Plaintiff's attorney, Christopher Galiardo, joins in this request.

The parties have been exchanging paper discovery and continue to engage in settlement negotiations. The additional time is needed by both sides for the purposes of scheduling depositions. There is a status conference that is scheduled for September 24 2008 at 3:00 p.m. Should the Court grant this application, the parties respectfully request that the Court adjourn the September 24th conference and that the settlement conference be rescheduled to a date after the close of discovery.

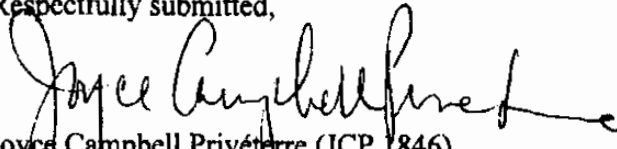
No previous request for an enlargement of discovery has been made. Accordingly, we respectfully request that fact discovery be enlarged from September 15, 2008 to October 30, 2008. The parties also respectfully request that the Court adjourn the conference scheduled for September 24, 2008 at 3:00 p.m.

MEMO ENDORSED

MEMO ENDORSED

Thank you for your consideration in this matter.


Respectfully submitted,


Joyce Campbell Privé (JCP 1846)
Assistant Corporation Counsel

cc: **Via Facsimile**

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And
Application GRANTED. The conference is adjourned to
11/5/08 at 3:45 pm in Courtroom 20C

SO ORDERED: SEP 11 2008

HON. PAULA A. CROTTY
UNITED STATES DISTRICT JUDGE